<u>REMARKS</u>

Claims 1, 2, 4-11, 13, and 14 are currently pending in this application. Favorable reconsideration of the application in light of the following comments is respectfully solicited.

In section 1 of the Office Action, claims 1, 2, 4, 5, 8-11, 13, and 14 were rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,509,974 (Hansen). In section 6 of the Office Action, claims 6 and 7 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Hansen. Applicants respectfully traverse.

Claim 1 recites, inter alia,

An apparatus for generating a workflow for making image recording media recorded with images expressed by page data from the page data described in page description language, comprising:

a designator for designating attributes of the image recording media constituting finally resulting matter resulting due to processing based on the workflow to be created; and

a workflow creator for creating the workflow by deciding upon processes required in order to make the image recording media and parameter values for the required processes based on attributes designated by the designator.

A "workflow" refers to a series of procedures for making image recording media from page data. In general, to create a workflow, it is necessary to specify processor modules corresponding to the required processes and their activation order, parameters provided to these processor modules, a host (e.g., a processing apparatus such as a computer) for executing these processor modules, and an output destination for the data created by these processor modules.

To create a workflow automatically, an apparatus for generating a workflow in accordance with claim 1 is provided with a workflow creator including

a rule storage unit for storing rules, corresponding to each attribute selectable for the image recording media, for creating the workflow for making the image recording media, in advance; an environmental information storage unit for storing in advance environmental information indicating an environment for executing each process capable of being selected for making the image recording media; and

a process content decider for deciding upon processes required to make the image recording media and parameter values for the required processes based on attributes designated by the designator by referring to the rules and the environmental information.

In embodiments of claim 1, a workflow can be automatically created by just designating attributes of the image recording media – if attributes for the image recording media are specified, then processes necessary to make the image recording media from page data and the parameter values for this processing are uniquely determined. Troublesomeness involved in the creation of a workflow can be dramatically reduced compared to the related art where the workflow construction process includes human intervention, and the operation of the printing and prepressing manufacturing system is more efficient.

In contrast, Hansen does not anticipate an apparatus for generating a workflow as recited in claim 1. To anticipate under 35 U.S.C.§ 102, a single reference must disclose, either expressly or inherently, each and every limitation recited in the claim. Page 4 of the Office Action asserts that Hansen's statement that "[i]f a particular capability is desired or necessary but that capability is not available . . . the resource allocator can make a determination, either automatically or with manual operator intervention, of how best to print a particular page" (col. 18, lines 46-51) fully discloses the recited "process content decider." However, this brief description fails to demonstrate that in the Hansen apparatus processes and parameter values are decided "based on attributes designated by the designator by referring to the rules and the environmental information," as recited in claim 1. Thus, the stated basis of rejection does not establish a *prima* facie case of anticipation, as it does not address all of the recited limitations.

Also, page 3 of the Office Action asserts that Hansen's statement that "the resource allocator can include 'policies' or predefined rules for handling particular capability 'requests'" (col. 18, lines 51-53) fully discloses the recited "rule storage unit." However, this brief description fails to disclose "storing rules, corresponding to each attribute selectable for the image recording media, for creating the workflow." Thus, the cited portion fails to demonstrate disclosure by Hansen of all of the claimed limitations.

Thus, Hansen does not disclose, or even suggest, an apparatus or method in which a workflow is created based on attributes of the image recording media input by a user by referring to rules and environmental information which are held in advance, as recited in claim 1.

Accordingly, Applicants respectfully request withdrawal of the rejections of claim 1, and claims 2 and 4-9 which depend thereon.

For much the same reasons, the Office Action fails to establish that Hansen discloses each and every limitation recited in claims 10, 11, 13, and 14. Independent claims 10 and 13 each recite, *inter alia*,

reading rules, corresponding to each attribute selectable for the image recording media, for creating the workflow for making the image recording media . . .; and

deciding upon processes required to make the image recording media and parameter values for the required processes based on the designated attributes by referring to the rules and the environmental information.

Pages 3 and 4 of the Office Action apply the same basis of rejection against claims 10 and 13 as claim 1, and therefore the rejection of claims 10 and 13 are similarly defective, as Hansen fails to disclose all of the limitations regarding at least the recited steps of "reading rules" and "deciding upon processes." Thus, Applicants respectfully request withdrawal of the rejection of independent claims 10 and 13, as well as claims 11 and 14 which depend thereon.

10/668,282

In view of the above remarks, Applicants respectfully submit that the application is in condition for allowance, and respectfully request the Examiner's favorable reconsideration as to

allowance. The Examiner is invited to contact the Applicants' representative listed below.

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 500417 and please credit any excess fees to

such deposit account.

Respectfully submitted,

McDERMOTT WILL & EMERY LLP

Eric M. Shelton

Registration No. 57,630

600 13th Street, N.W. Washington, DC 20005-3096 Phone: 202.756.8000 EMS;amz

Facsimile: 202.756.8087 **Date: March 16, 2009**

Please recognize our Customer No. 20277 as our correspondence address.